#### IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF GEORGIA GAINESVILLE DIVISION

In re:

EXTRUSION GROUP, LLC, et al.,1

Debtors.

EXTRUSION GROUP, LLC; EXTRUSION GROUP SERVICES, LLC; EG GLOBAL, LLC; EG VENTURES, LLC; MICHEAL HOUSTON; and MICHAEL COOK,

Plaintiffs,

v.

KIMBERLY-CLARK CORPORATION; and KIMBERLY-CLARK GLOBAL SALES, LLC,

Defendants.

Case No.: 21-21053-JRS

Chapter 11

(Jointly Administered)

Adversary Proceeding No. 21-02038-JRS

# JOINT STIPULATION AND PROPOSED ORDER TO EXTEND TIME TO RESPOND TO THE ADVERSARY COMPLAINT

WHEREAS, on October 5, 2021, the above-captioned debtors and debtors-in-possession (collectively, the "Debtors") filed voluntary petitions for relief under chapter 11 of the Bankrupty Code in the United States Bankruptcy Court for the Northern District of Georgia, Gainesville District (the "Court");

<sup>&</sup>lt;sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, if applicable, are: Extrusion Group, LLC (9996), EG Global, LLC (0194), Extrusion Group Services, LLC (2698), and EG Ventures, LLC (N/A).

**WHEREAS**, on October 11, 2021, the Debtors, Micheal Houston, and Michael Cook (collectively, "**Plaintiffs**") commenced the above-captioned adversary proceeding against Kimberly-Clark Corporation and Kimberly-Clark Global Sales, LLC (collectively, "**Defendants**") by filing the *Adversary Complaint* [Adv. Dkt. No. 1] (the "**Complaint**");

WHEREAS, pursuant to the Court's *Order Granting Motion for Temporary Restraining Order and Preliminary Injunction Enjoining Certain Litigation* [Adv. Dkt. No. 33] (the "TRO Order"), except as otherwise set forth in the TRO Order, the Court stayed the "District Court litigation" as to Michael Cook and Michael Houston through and including March 15, 2022;

**WHEREAS**, pursuant to this Court's order dated November 23, 2021 [Adv. Dkt. No. 16], Defendants' deadline to respond to the Complaint is January 28, 2022, which may be extended with leave of the Court;

**WHEREAS**, Plaintiffs and Defendants have conferred and wish to extend Defendants' deadline to respond to the Complaint.

**IT IS HEREBY STIPULATED** and agreed by and between Plaintiffs and Defendants that Defendants' time to answer, move, or otherwise respond to the Complaint, shall be extended through and including March 22, 2022.

Stipulated this day of January 27, 2022.

#### Attorneys for Debtors

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### /s/ Micheal Houston

Micheal Houston

#### /s/ Michael Cook Michael Cook

#### Attorneys for Defendants

#### /s/ Gary W. Marsh

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#### and

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## Exhibit A

**Proposed Order** 

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Plaintiffs,

v.

Adversary Proceeding No. 21-02038-JRS

KIMBERLY-CLARK CORPORATION; and KIMBERLY-CLARK GLOBAL SALES, LLC,

Defendants.

#### ORDER EXTENDING TIME TO RESPOND TO THE ADVERSARY COMPLAINT

The Court, having reviewed the *Joint Stipulation and Proposed Order to Extend Time to Respond to the Adversary Complaint* (the "**Stipulation**")<sup>2</sup> and sufficient cause appearing therefore, HEREBY MAKES THE FOLLOWING ORDER:

<sup>&</sup>lt;sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, if applicable, are: Extrusion Group, LLC (9996), EG Global, LLC (0194), Extrusion Group Services, LLC (2698), and EG Ventures, LLC (N/A).

<sup>&</sup>lt;sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings afforded to them in the Stipulation.

- 1. The deadline for Defendants to answer, move, or otherwise respond to the Complaint is hereby extended through and including March 22, 2022.
- 2. This Order is without prejudice to further extensions of Defendants' deadline to answer, move, or otherwise respond to the Complaint either with the agreement of Plaintiffs or with leave of Court.
- 3. This Court shall retain exclusive jurisdiction with respect to the implementation or interpretation of the Stipulation or this Order.

It is SO ORDERED.